

**CALFRESH (CF) PROGRAM
REQUEST FOR POLICY/REGULATION INTERPRETATION**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 08/11/2014 NEED RESPONSE BY: as soon as possible
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Sacramento County
3. PHONE NO.:	7. SUBJECT: Recertification
4. REGULATION CITE(S): 63-504	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). N/A
9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):	

Is it ok for the CWD to complete the interview, receive all required paperwork and verifications for a recertification in the month prior to when the recertification is due?

10. REQUESTOR'S PROPOSED ANSWER:

Yes, as long as the client is not discontinued for not attending the appointment, the information is not processed until the month the recertification is due and the information is not made effective until the new payment period starts.

Ryan Fruchtenicht said earlier this year at CWDA that completing the RRR early was ok, we just need something in writing

11. STATE POLICY RESPONSE (CFPB USE ONLY):

Yes. Consistent with federal regulations at 7 CFR 273.14(b) (1) (i) and MPP Section 63-504.251, the county shall issue the Notice of Expiration of Certification (NEC) before the first day of the last month of the certification period, but not before the first day of the next-to-last month. There is nothing in federal rules that prohibits a county from processing the recertification application and completing the recertification process in the second-to-last-month of the current certification period. The new certification period would not be effective until the current certification period expires and all requirements of the recertification process have been completed (interview, verifications, etc.).

FOR CDSS USE

DATE RECEIVED:

8/11/2014

DATE RESPONDED TO COUNTY/ALJ:

9/05/2014